

Kevin H. Marino
John D. Tortorella
MARINO, TORTORELLA & BOYLE, P.C.
437 Southern Boulevard
Chatham, New Jersey 07928-1488
Tel: (973) 824-9300
Fax: (973) 824-8425
Counsel for Defendant Joseph Schwartz

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

vs.

JOSEPH SCHWARTZ,

Defendant.

Case 2:22-cr-00013-001-SDW

Hon. Susan D. Wigenton, U.S.D.J.

**NOTICE OF MOTION ON SHORT NOTICE
FOR BAIL PENDING APPEAL
OR TO EXTEND SURRENDER DATE**

PLEASE TAKE NOTICE that as soon as counsel may be heard, Defendant, Joseph Schwartz ("Schwartz"), through his attorneys, Marino, Tortorella & Boyle, P.C. (Kevin H. Marino, Esq., appearing) will move before the Honorable Susan D. Wigenton, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King, Jr. Federal Building & Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an order (i) granting Schwartz bail pending appeal; or (ii) in the alternative, extending his surrender date by ninety-one (91) days from the current surrender date of August 17, 2025, to November 16, 2025.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Schwartz will rely on the accompanying letter brief filed herewith. A proposed form of Order is also submitted herewith.

Dated: July 24, 2025

MARINO, TORTORELLA & BOYLE, P.C.

By: 
KEVIN H. MARINO